

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KTM AG,	)	
	)	
	)	Case No.: 21-cv-1279
Plaintiff,	)	
	)	
v.	)	
	)	Judge Robert M. Dow, Jr.
THE INDIVIDUALS, CORPORATIONS,	)	
LIMITED LIABILITY COMPANIES,	)	
PARTNERSHIPS, AND UNINCORPORATED	)	
ASSOCIATIONS IDENTIFIED ON	)	
SCHEDULE A HERETO,	)	
	)	
	)	
Defendants.	)	

**PLAINTIFF’S *EX-PARTE* MOTION TO  
EXTEND THE TEMPORARY RESTRAINING ORDER**

Pursuant to Federal Rule of Civil Procedure 65(b)(2), Plaintiff KTM AG seeks to extend the Temporary Restraining Order entered by the Court on April 28, 2021 [Dkt. 19, 20] (“the TRO”) which is set to expire on May 12, 2021, for a period of fourteen (14) days to and including May 26, 2021.

Since entry of the TRO, Plaintiff has been working to ensure compliance with its terms by third parties. In particular, Plaintiff promptly subpoenaed information concerning the identities of defendants from third parties including Amazon, which is in the process of complying. Plaintiff respectfully requests the Court to extend the TRO to provide additional time for Amazon to comply with the terms thereof.

Plaintiff submits that good cause exists for extending the TRO to prevent Defendants from transferring assets from their U.S.-based financial accounts, modifying the names of their

internet stores, or removing their internet stores from their current platform, among other things, as outlined in Plaintiff's Memorandum in Support of *Ex Parte* Motion for a Temporary Restraining Order [Dkt. 9]. This probability of harm is significant and continuing.

Wherefore, Plaintiff requests that the TRO be extended for a period of fourteen (14) days to and including May 26, 2021.

Respectfully submitted,

Dated: May 6, 2021

By: s/ Michael A. Hierl  
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Attorneys for Plaintiff  
KTM AG

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Plaintiff's *Ex-Parte* Motion to Extend the Temporary Restraining Order was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on May 6, 2021.

s/Michael A. Hierl